

1 MINTZ LEVIN COHN FERRIS  
2 GLOVSKY AND POPEO, P.C.  
3 Andrew D. Skale (211096)  
4 ADSkale@mintz.com  
5 Laura Franco (186765)  
6 LFranco@mintz.com  
7 Anthony J. Viola (*pro hac vice* forthcoming)  
8 AJViola@mintz.com  
9 Kara M. Cormier (*pro hac vice* forthcoming)  
10 KMCormier@mintz.com  
11 44 Montgomery Street, 36th Floor  
12 San Francisco, CA 94104  
13 Telephone: 415.432.6000

8 LWD ADVISORS, INC.  
9 Jeff Hyman (171896)  
10 jeff@lwdadvisors.com  
11 700 El Camino Real Suite 120 #1310  
12 Menlo Park CA 94025  
13 Telephone: 650.219.4229

11 Attorneys for Plaintiff  
12 IYO, INC.

13 UNITED STATES DISTRICT COURT  
14 NORTHERN DISTRICT OF CALIFORNIA

15 IYO, INC.

16 Plaintiff,

17 v.

18 IO PRODUCTS, INC., OPENAI, INC.,  
19 OPENAI, LLC, SAM ALTMAN, and SIR  
20 JONTHAN PAUL IVE,

21 Defendants.

Case No. 3:25-cv-4861

**DECLARATION OF JEFF HYMAN IN  
SUPPORT OF PLAINTIFF IYO, INC.'S  
MOTION FOR TEMPORARY  
RESTRAINING ORDER AND  
PRELIMINARY INJUNCTION**

Complaint Filed: June 9, 2025  
Trial Date: None Set

1 I, Jeff Hyman, do hereby declare as follows:

2 1. I am the outside General Counsel of Plaintiff IYO, Inc. ("Plaintiff" or "IYO") in the  
3 above-captioned matter. I am over 18 years of age. I have personal knowledge of the facts stated  
4 herein, and if called as a witness, I could and would testify competently thereto. I make this  
5 declaration in support of Plaintiff's Motion for Temporary Restraining Order and Preliminary  
6 Injunction ("Motion").

7 2. On June 9, 2025, I emailed notice of Plaintiff's Motion to the Defendants' attorney,  
8 Margret Caruso of Quinn Emmanuel Urqhart & Sullivan, whom I understand represents all the  
9 Defendants, and asked her to confirm as such. I will send conformed copies of the Motion, the  
10 Complaint, and their accompanying documents, to Ms. Caruso after they are filed with the Court.  
11 Once the Court sets a date and time for the hearing on Plaintiff's Motion, I will also send the same  
12 to Ms. Caruso.

13 I declare under penalty of perjury under the laws of the United States of America that the  
14 foregoing is true and correct.

15 Executed on June 9, 2025 in Menlo Park, California.

Signed by:

Jeff Hyman

CD6C0AE500E24C2...  
Jeff Hyman

16  
17  
18 530024586v.3